

1 RENE L. VALLADARES
Federal Public Defender
2 Nevada State Bar No. 11479
3 BENJAMIN F. J. NEMEC
Assistant Federal Public Defender
4 Nevada State Bar No. 14591
5 Las Vegas, NV 89101
6 (702) 388-6577/Phone
7 (702) 388-6261/Fax
Ben_Nemec@fd.org
8 Attorney for Katryce M. Reid Pitre

9
10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 United States of America,
13 Plaintiff,
14 v.
15 Katryce M. Reid Pitre,
16 Defendant.

Case No. 2:21-mj-00965-BNW

**Joint Motion to Allow Ms. Pitre to
Withdraw her Guilty Plea**

17
18 Jason Frierson, United States Attorney, and Imani Dixon, Assistant
19 United States Attorney, counsel for the United States of America, and Rene L.
20 Valladares, Federal Public Defender, and Benjamin F. J. Nemec, Assistant
21 Federal Public Defender, counsel for Defendant Katryce Reid Pitre, jointly move
22 to allow Ms. Pitre to withdraw her plea, amend count one to reckless driving, and
23 apply the Judgment to the amended count.
24

25 On February 23, 2022, Ms. Pitre pled guilty pursuant to a plea agreement.
26 ECF Nos. 12, 13. The plea agreement provided that if Ms. Pitre “successfully
complete[d] the special conditions” set for in the plea agreement, “the parties

1 shall jointly move to allow the Defendant to withdraw her guilty plea to Count
2 One, and the Government will move to amend Count One to a charge of Reckless
3 Driving” in violation of 36 C.F.R. § 4.2 and N.R.S. 484B.653. ECF No. 12, p. 3.

4 The parties jointly agreed to recommend a sentence of three years of
5 supervised probation with special conditions, “to include alcohol abuse treatment
6 and no adverse contact with law enforcement.” ECF No. 12, p. 3.

7 This Court sentenced Ms. Pitre on June 8, 2022. ECF No. 15. This Court
8 followed the joint recommendation of the parties, sentencing Ms. Pitre to 36
9 months probation with special conditions. ECF Nos. 15, 16.

10 Ms. Pitre move for early termination of her supervised probation. ECF No.
11 23. This Court granted her motion. ECF No. 26.

12 As a result, Ms. Pitre successfully completed the conditions of her
13 supervised probation. The parties, following their plea agreement, jointly move
14 to allow Ms. Pitre to withdraw her prior plea, amend Count One of the Judgment
15 to Reckless driving in violation of 36 C.F.R. § 4.2 and N.R.S. 484B.653, plea
16 guilty to that amended Count One, and apply the Judgment to the amended
17 Count One.
18

19 . . .

20 . . .
21
22
23
24
25
26

1 DATED: August 29, 2023.

2
3 RENE L. VALLADARES
Federal Public Defender

4 /s/ Benjamin F. J. Nemec

5 BENJAMIN F. J. NEMEC
6 Assistant Federal Public Defender
Attorney for Katryce M. Reid Pitre

7
8 JASON FRIERSON
9 United States Attorney

10 /s/Imani Dixon

11 IMANI DIXON
12 Assistant United States Attorney
Attorney for Government

13
14 **ORDER**

15 **IT IS SO ORDERED**

16 **DATED:** 5:58 pm, August 30, 2023

17 

18 **BRENDA WEKSLER**
19 **UNITED STATES MAGISTRATE JUDGE**

CERTIFICATE OF ELECTRONIC SERVICE

The undersigned hereby certifies that she is an employee of the Federal Public Defender for the District of Nevada and is a person of such age and discretion as to be competent to serve papers.

That on August 29, 2023, she served an electronic copy of the above and foregoing Stipulation to allow Ms. Pitre to Withdraw her Guilty Plea by electronic service (ECF) to the person named below:

JASON M. FRIERSON
United States Attorney
IMANI DIXON
Assistant United States Attorney
501 Las Vegas Blvd. South
Suite 1100
Las Vegas, NV 89101

/s/ Celina Moore

Employee of the Federal Public
Defender